

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

DECLARATION OF NICHOLAS SHAY

I, Nicholas Shay, declare under penalty of perjury:

1. I am a current employee of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (together, “FTX”), and a former employee of pre-petition FTX. I began working for FTX in 2021 as a Software Engineer.

2. I am generally familiar with the user interface associated with customer accounts on the FTX.com exchange based on my experience as a Software Engineer at FTX. Before the November 2022 bankruptcy filing, I provided coding-related support for the online web platform and Blockfolio mobile application for users to access accounts on the FTX.com exchange. I currently provide FTX with technical and other support in connection with the claims portal used by creditors during the pendency of the bankruptcy proceedings. Through these roles I have experience reviewing the FTX codebase.

3. I have recently reviewed the codebase related to the prepetition FTX.com user interface (the “User Interface Codebase”). The User Interface Codebase is the set of code that determines the information and layout visible to a user interacting with the FTX.com platform. I reviewed specific code files associated with the User Interface Codebase as it existed in October 2022.

4. The User Interface Codebase indicates that an FTX.com customer logged into its account was able to access and view position and transaction information for the account and associated subaccounts. For example, a customer could access its “Wallet” page when logged in, and from there could access pages for “Deposits,” “Withdrawals,” “Fills,” and “Positions.” The “Fills” page provided the customer with access to historical trades and the “Positions” page provided the customer with access to the then-current trading positions. These pages provided detail with respect to each type of transaction or other account data, including, as applicable, coin, size or amount, date and time, source or destination address, and type of transaction.

5. The information set forth herein is based on my review of the User Interface Codebase and my general recollection with respect to the user interface for the FTX.com exchange prior to the Petition Date.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on: December 5, 2024

/s/ Nicholas Shay

Nicholas Shay
Software Engineer